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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

STACY ALLEN

Plaintiff,

v.

A CLEMENTE, INC.; ANTHONY CLEMENTE, INC.; SOLVAY SPECIALTY POLYMERS, USA, LLC; SOLVAY SOLEXIS, INC.; ARKEMA, INC.; E.I. DU PONT DE NEMOURS & COMPANY; THE CHEMOURS COMPANY; THE CHEMOURS COMPANY FC, LLC; THE 3M COMPANY; AND JOHN DOE ENTITIES #1-20

Defendants.

CASE NO. 1:22-cv-00396-NLH-AMD

CIVIL ACTION

NOTICE OF MOTION TO REMAND

Return Date: May 2, 2022

PLEASE TAKE NOTICE that on May 2, 2022, at 10:00 A.M., or as soon thereafter as counsel may be heard, attorneys for the Plaintiff(s) above, shall move, pursuant to 28 U.S.C. § 1447 before the Honorable Noel L. Hillman, United States District Court Judge for the District of New Jersey, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101 for the entry of an order remanding this case to the New Jersey Superior Court, and for such other relief as the Court deems just and proper; and

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff(s) shall rely upon the accompanying memorandum of law and attorney declaration with exhibits.

By: /s/ Arnold C. Lakind
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Dated: April 7, 2022